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June 3, 2015

VIA ECF

Honorable Lorna Schofield
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

RE: Jody Kriss, et al. v. Bayrock Group LLC, et al., Case No. 10 CV 3959
(LGS)(FM) ("Kriss I") / Jody Kriss, et al. v. Bayrock Group LLC, et al.,
Case No. 13 CV 3905 (LGS)(FM) ("Kriss II")

Dear Judge Schofield:

We represent Frederick Oberlander, Esq., formerly counsel for the plaintiffs in the above referenced matter ("Oberlander"). We write to respectfully request that our time to submit a reply to the Response of the "Bayrock Defendants" to Oberlander's Motion to Set Aside the April 30, 2015 Order issued by United States Magistrate Judge Frank Maas be extended from Friday June 5, 2015 to Tuesday June 9, 2015.

By memo endorsement, the Court extended defendant Felix Sater's time to submit response from May 29, 2015 to June 2, 2015 with our reply due on June 9, 2015. Accordingly, our reply to the Bayrock Defendants' Response is currently due on June 5, 2015 and to Defendant Sater's on June 9, 2015. Since we believe that it is more efficient for the Court to receive a single reply addressing the arguments raised by both defendant groups rather than two separate submissions, we respectfully submit that it makes sense to make the deadlines for our replies the same.

We have consulted with counsel for both the Bayrock Defendants and Defendant Sater and they have given their consent to this extension. Accordingly, we respectfully request that our client's time to submit reply to the Bayrock Defendants' Response be extended from June 5, 2015 to June 9, 2015.

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We thank the Court for its kind attention and consideration of our request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Simon Miller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Simon Miller

Frederick M. Oberlander, Esq. (by email)

Bradley D. Simon, Esq. (by email)

Walter Saurack, Esq. (by email)

Michael P. Beys, Esq. (by email)

Robert Wolf, Esq. (by email)